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**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**

In The Matter of the Application of SAN DIEGO GAS  
& ELECTRIC COMPANY (U902E) for a Certificate of  
Public Convenience and Necessity for the South Orange  
County Reliability Enhancement Project

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A. 12-05-020  
(Filed May 18, 2012)

**NOTICE OF ORAL AND WRITTEN EX PARTE COMMUNICATION**

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Attorneys for The City of San Juan Capistrano

Dated: October 24, 2016

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OF THE STATE OF CALIFORNIA**

In The Matter of the Application of SAN DIEGO GAS  
& ELECTRIC COMPANY (U902E) for a Certificate of  
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**NOTICE OF ORAL AND WRITTEN EX PARTE COMMUNICATION**

Pursuant to Rule 8.3 of the Commission's Rules of Practice and Procedure, the City of San Juan Capistrano (the City) submits this Notice of Oral and Written Ex Parte Communication.

On October 20, 2016, at 11:00 a.m., Dr. Dariush Shirmohammadi of Shir Consultants, consultant to the City, Charles View City Project Manager and Jeanne Armstrong of Goodin, MacBride, Squeri & Day, outside counsel to the City, met with Charlyn Hook, Legal Advisor to Commissioner Michel Florio. On October 20, 2016, at 1:30 p.m., Dr. Shirmohammadi, Mr. View and Ms. Armstrong met with Ehren Seybert, Energy Advisor to Commissioner Carla Peterman. On October 20, 2016, at 2:00 p.m., Dr. Shirmohammadi, Mr. View and Ms. Armstrong met with Sean Simon, Energy Advisor to Commissioner Lianne Randolph. All meetings took place at the Commission's San Francisco offices, were initiated by the City, and lasted approximately 30 minutes each. The content of the meetings was substantially similar and included oral and written communications (attached).

Ms. Armstrong spoke about the overall differences between the Proposed Decision and Alternate Proposed Decision (APD) and, in particular, how the APD suffered from deference to the California Independent System Operator which was inconsistent with the Commission's statutory duties. Mr. View addressed the significant negative impacts to the economically and socially diverse community in San Juan Capistrano which would result from the approval of the

Proposed Project. In addition Mr. View addressed the degradation of the City's historic district by the complete or partial demolition of the historic substation building which is called for under the Proposed Project. Dr. Shirmohammadi addressed each of the alleged feasibility concerns regarding Alternative J that were raised in the APD as well as some misconceptions regarding the cost of Alternative J in comparison to the Proposed Project.

For a copy of this notice please contact Wendy Peña at 415-392-7900 or [wpena@goodinmacbride.com](mailto:wpena@goodinmacbride.com).

Respectfully submitted this October 24, 2016, at San Francisco, California.

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By /s/Jeanne B. Armstrong  
Jeanne B. Armstrong

Attorneys for the City of San Juan Capistrano

## **ATTACHMENT A**



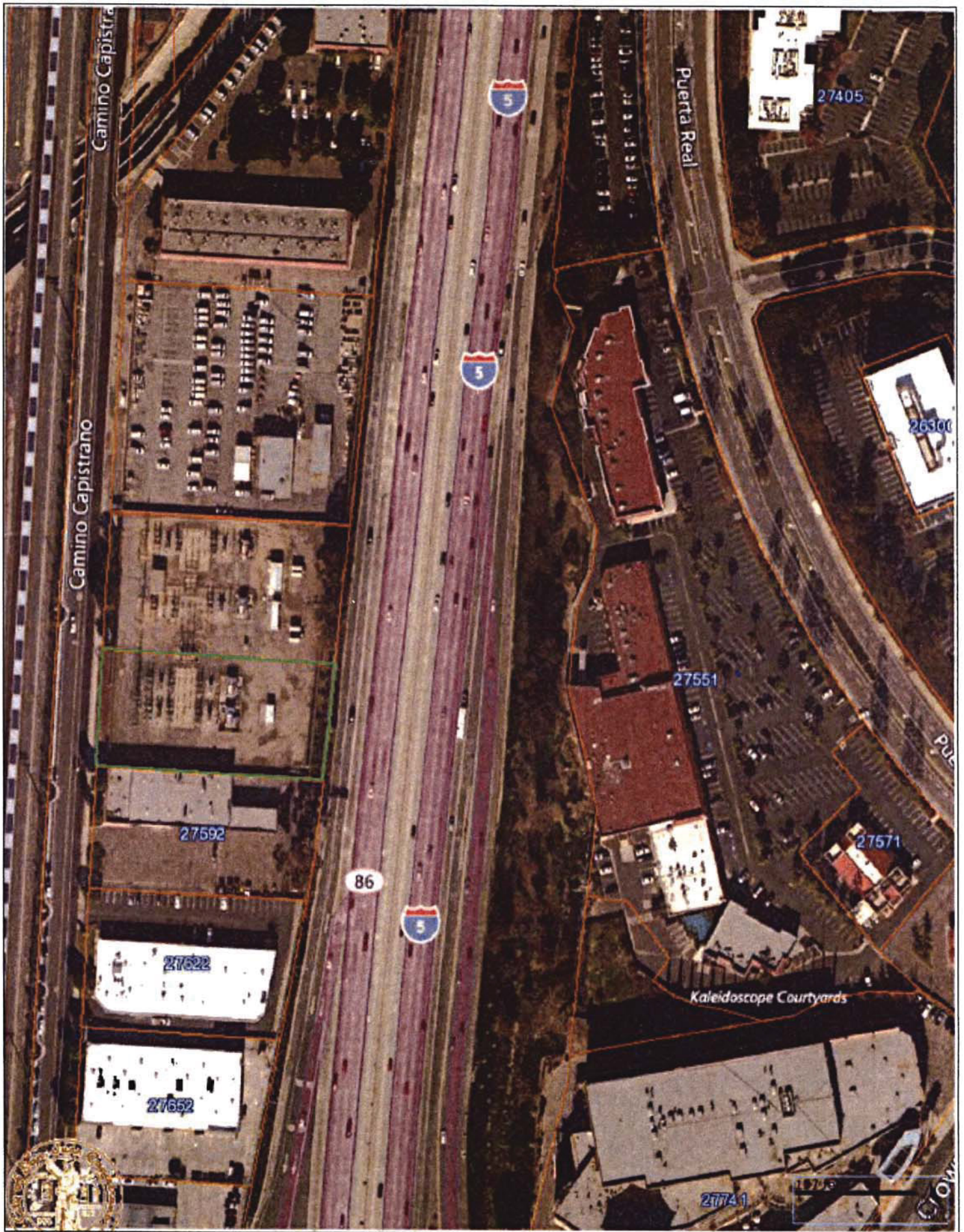






Proposed Project Location





Project Alternative J



## **ATTACHMENT B**



# United States Department of the Interior

NATIONAL PARK SERVICE  
1849 C Street, N.W.  
Washington, DC 20240

## **The United States Department of the Interior National Park Service**

### **National Register of Historic Places Evaluation/Return Sheet**

Property Name: San Diego Gas and Electric San Juan Capistrano Substation  
Orange County,

Reference Number: 15000570

#### Reason for Return

The request for Determination of Eligibility is being returned for substantive and technical revision. The submission claims significance under Criterion A in the area of engineering, and the boundary of the property consists of the footprint of the substation building (also referred to as the utility building and hereafter referred to as “the building”). The property owner, which objects to the nomination, petitioned for a substantive review of the nomination which resulted in an extension of the review period. The petitioner presented a number of documents to support its conclusion that the property is not eligible.

It is our opinion that the building is eligible for inclusion in the National Register of Historic Places under Criterion A, but that the documentation submitted is inadequate to fully support this finding and fails to address significant questions brought up by the petitioner.

It is apparent, as noted in the 2008 McKenna report, that the San Juan Capistrano substation likely meets the test of significance under Criterion A. The substation served as a vital and pioneering link between two power distribution systems, allowing for further growth of the overall system and thus spurring growth and development in the region. The building in question, while, as the petitioner points out repeatedly, is only a component of the substation, it is a significant and highly visual component. The location and design of this building, and of similar buildings in other power facilities of the era, is meant to present a face to the community. It is not simply a utilitarian structure meant simply to protect important components from the elements; the decision to utilize a restrained classical vocabulary was a conscious effort to “brand” the facility and present a

dignified and substantial air to what is ordinarily a rather mundane component of power infrastructure.

Where the document falls short is in the analysis of integrity of the substation as a whole as it relates to the extant, nominated building. The petitioner rightly points out that a “substation” is more than a building, that it includes many elements that work together to facilitate the flow of power. The nomination as presented gives short shrift to the discussion of what the key components are and of how such a facility works. By limiting the boundaries and description and, for the most part, the focus of the nomination to the footprint of the building, the nomination does not truly provide an analytical discussion of integrity. The substation may have had many of its components moved or demolished, but there are remnants evident on the ground that can help tell the story and illustrate the working of the facility. It might be best, if this property is resubmitted, to revisit the boundaries of the nominated property and to look at the entirety of the facility.

The nomination does not adequately describe the role that equipment in the building played; this is important in helping to support the claim of significance. It is clear that some of the equipment and activities of the substation were sensitive or fragile enough that the construction of a shelter for them was necessary. What were they?

The petitioner’s position that the document submitted was substantially revised between its presentation to the State Review Board and its submission to the Keeper is immaterial. The role of the State Review Board is advisory – to advise the State Historic Preservation Officer whether a property meets one or more of the National Register criteria for evaluation and to recommend whether or not it be nominated.

The various reports presented by the petitioner bring up valid points concerning the evaluation of integrity of the property, in particular how the building works in conjunction with the entire substation property and how the loss of certain features of the substation affect the ability of the building to reflect the significant of the substation. In other points of integrity, the reports miss the mark. The analyses of integrity of setting, of design, of materials, and of association are all too narrowly read. The immediate setting of the facility – the building and accompanying structures (both extant and missing) is important; the change from an open agricultural land to residential land is much less so. The alteration of a door or window or two does not constitute a marked change in the integrity of the building; it still represents the functional intent of the designer. So, too, the loss of minor fixtures such as gutters and lights does not constitute a sever loss of integrity of materials. The nomination as presented, does, however, fail to fully account for the effects of the loss of exterior equipment and structure and how this affects the overall integrity of design, feeling, and association.

The comparative analysis provided is a good start, especially in light of the contentious nature of the nomination, but the petitioner does bring up a valid point about the lack of comparable examples of substations (distributive, not generating) in the area. Limiting



the comparatives to listed or eligible properties limits the full range of truly comparable resources. This substation was the pioneer in expansion of power distribution in the area. But from reading the nomination, we have no idea what the geographic spread of these facilities was (especially in the historic period), or how many there are or what condition other might be in. Of course, the petitioner misses the mark in the narrow reading of comparables by discounting properties that aren't located in southern California. While nominated for its significance at the local level, the property is still an example of a type common to all developed areas of the state.

To summarize, the substantive aspects of this nomination that need to be addressed are the boundaries, the evaluation of integrity of the building as it relates to the substation as a whole, and a better comparative analysis of similar and relatively contemporaneous facilities in the area.

#### Technical issues

Please check the appropriate box in Section 3; this is a request for determination of eligibility based on owner objection. Also, if submitting scans of correspondence, please respect the hierarchy of importance of such documents. The official notification of objection from the owner was buried 181 pages into a 400+ page pdf of correspondence. Such a significant part of a nomination package should be up front along with the letter of transmittal.

We appreciate the opportunity to review this DOE and hope that you find these comments useful. Please feel free to contact me if you have any questions. I can be reached at (202) 354-2275 or email at <[James\\_Gabbert@nps.gov](mailto:James_Gabbert@nps.gov)>.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. Gabbert", with a stylized flourish at the end.

Jim Gabbert, Historian  
National Register of Historic Places  
9/22/2015

## **ATTACHMENT C**

Is Alternative J Technically  
Feasible & Cost Effective



## Reliability Concerns with Alternative J (1)

- Alternative J causes overloads in SCE system under contingency conditions
  - The same SCE system overloads happen under SOCREP (SDG&E Alternative)
  - Any solution proposed for SCE system overloads under SOCREP could be used for Alternative J
- There is insufficient space for Alternative J's 230 kV switchyard at the Trabuco Substation
  - Record shows that the number of substation elements required for Alternative J switchyard can readily fit in allocated space

# Reliability Concerns with Alternative J (2)

Table 1 Thermal Overloads in the SDGE SOC System - Based on 2020 Off-Peak Case (1800 MW Northbound Flow via the SONGS Path)

SOCREP VS RDEIR Trabuco Alt. and Modified RDEIR Trabuco Alt. which adds 2nd bank at Trabuco and eliminates BK2 & BK4 at Talega

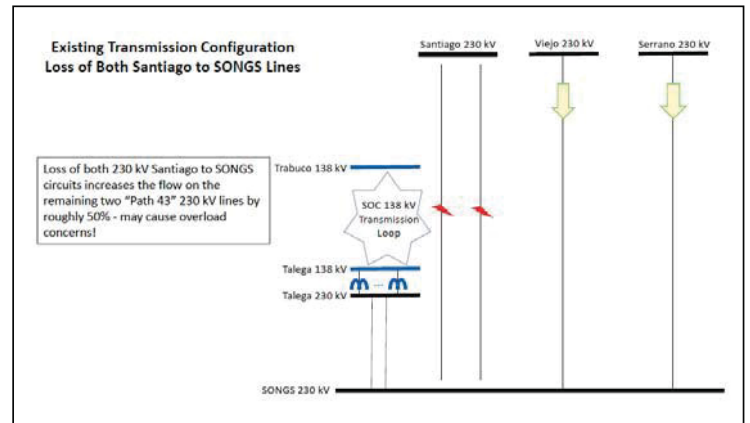
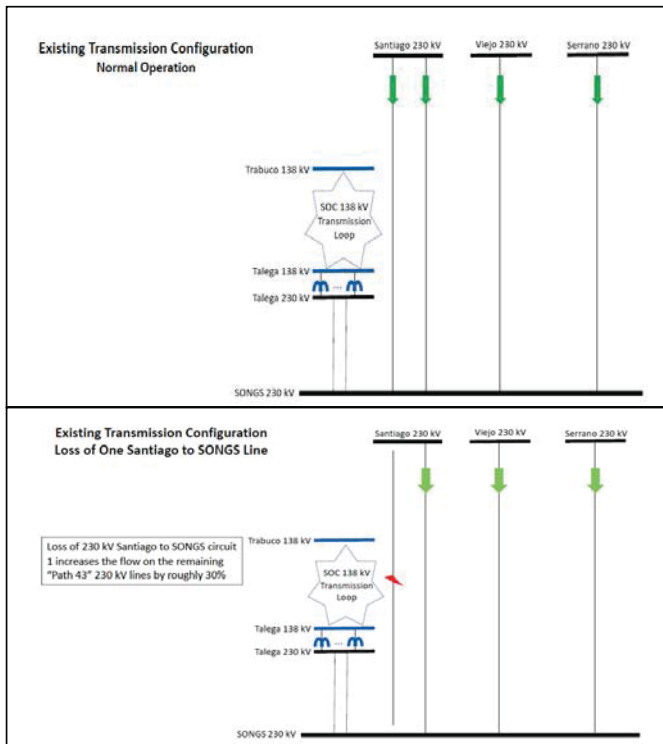
- Alternative J results in potential overloads in SDG&E SOC transmission loop under Category C contingencies

- Extremely simple SPS solves all these problems

ID	Overloaded Facility	Contingency	Category Description	Thermal Loading (% over applicable rating)		
				SOCREP	RDEIR Trabuco Alternative	Modified RDEIR Trabuco Alt.
SDGE-T-OP1	22862 TRABUCO2 230 22860 TRABUCO 138 1	L_0010_Line S.ONOFRE 230.0 to TRABUCO2 230.0 Ckt 1 and L_40082_Line S.ONOFRE 230.0 to SANTIAGO 230.0 Ckt 1	P6 (N-1-1) P7 (N-2)*	NA	114	<85
SDGE-T-OP2	22112 CAPSTRNO 138 22656 PICO 138 1	L_0010_Line S.ONOFRE 230.0 to TRABUCO2 230.0 Ckt 1 and L_40082_Line S.ONOFRE 230.0 to SANTIAGO 230.0 Ckt 1	P6 (N-1-1) P7 (N-2)*	NA	99	105
SDGE-T-OP3	22840 TALEGA 138 22842 TA TAP33 138 1	L_0010_Line S.ONOFRE 230.0 to TRABUCO2 230.0 Ckt 1 and L_7008_Line TALEGA 138.0 to PICO 138.0 Ckt 1	P6 (N-1-1)	NA	98	102
SDGE-T-OP4	22842 TA TAP33 138 22656 PICO 138 1	L_0010_Line S.ONOFRE 230.0 to TRABUCO2 230.0 Ckt 1 and L_7008_Line TALEGA 138.0 to PICO 138.0 Ckt 1	P6 (N-1-1)	NA	97	102
SDGE-T-OP5	22841 LAGNA NL TAP 138 22396 LAGNA NL 138 1	L_0010_Line S.ONOFRE 230.0 to TRABUCO2 230.0 Ckt 1 and L_7002_Line CAPSTRNO 138.0 to PICO 138.0 Ckt 1	P6 (N-1-1)	NA	97	100
SDGE-T-OP6	22840 TALEGA 138 22656 PICO 138 1	L_0010_Line S.ONOFRE 230.0 to TRABUCO2 230.0 Ckt 1 and Tap_9001_Line TALEGA-TAP33-PICO-SANMATEO 138.0 1	P6 (N-1-1)	NA	95	100

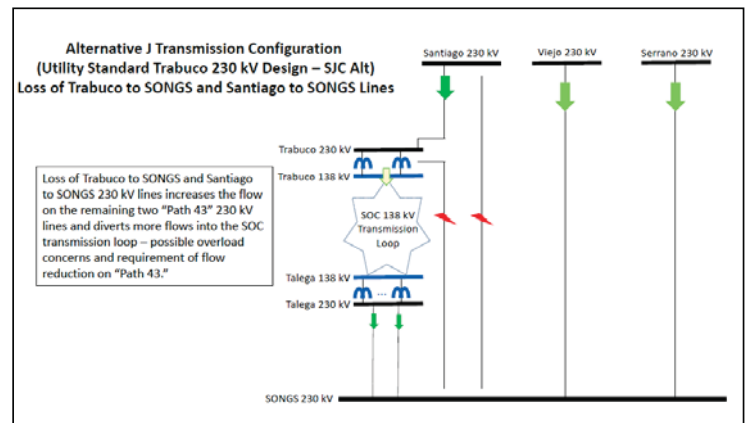
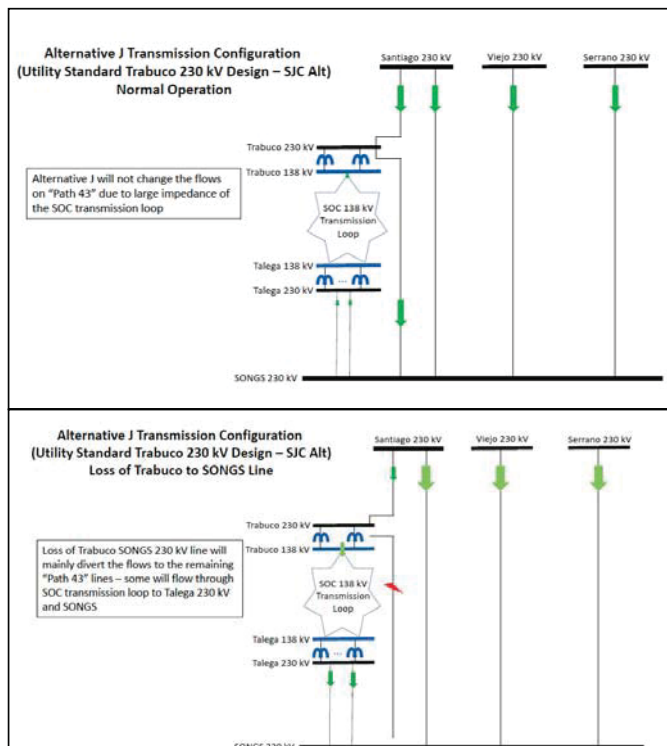
Note: \* P7 is applicable N-2 contingency assuming the RDEIR Trabuco Alternative was modified to fit a industry standard substation

# SOC Overload (1)



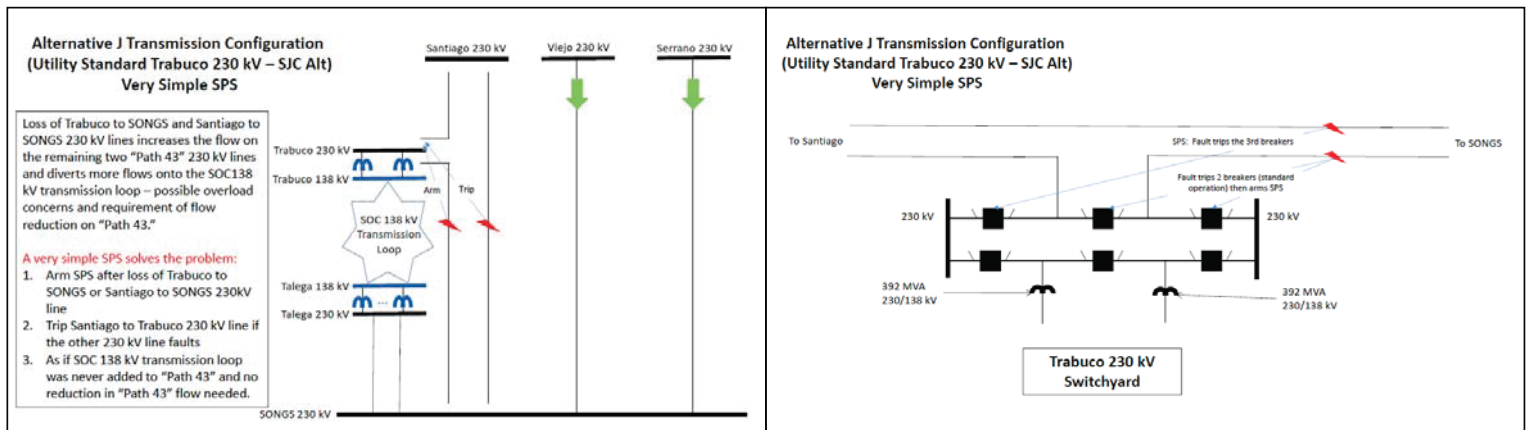


# SOC Overload (2)



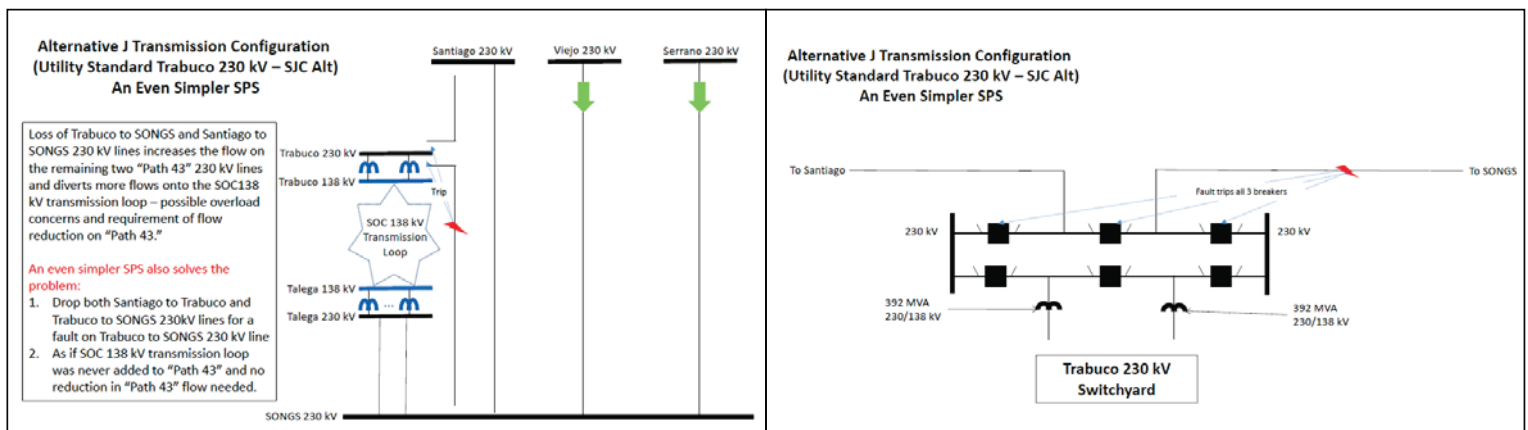
# Simple SPS for Alternative J

- This simple SPS could be readily implemented and completely resolves all concerns with “Path 43” flow limit



## Even Simpler SPS for Alternative J

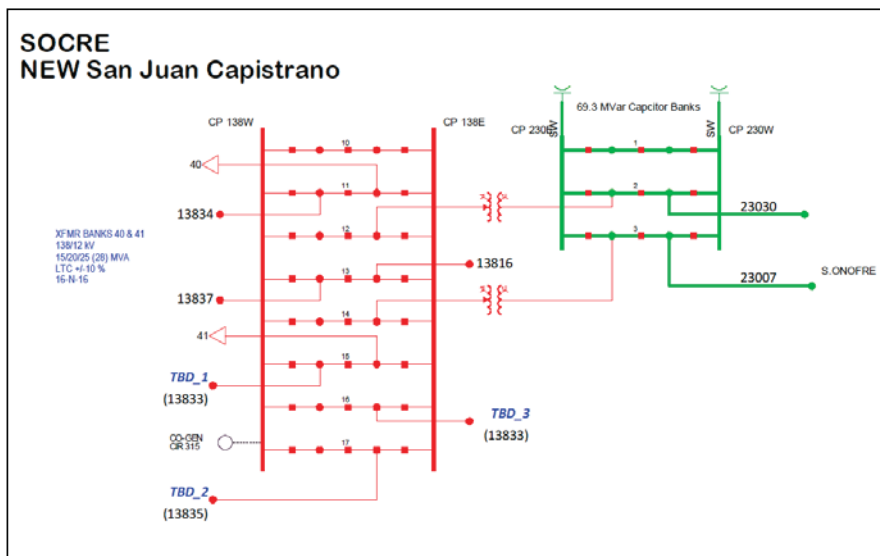
- This simpler SPS could be readily implemented and completely resolves all concerns with “Path 43” flow limit



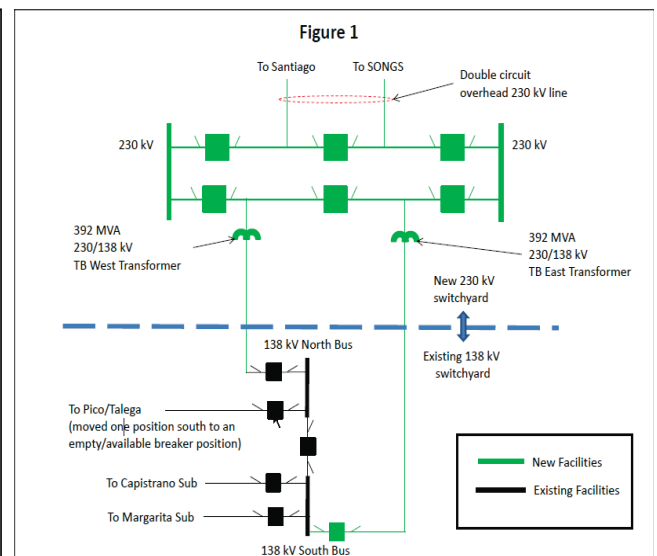
## Trabuco 230 kV Switchyard Location

- The new Trabuco 230 kV air insulated switchyard will have fewer elements than the reconfigured Talega 230 kV air insulated switchyard but the same roughly 2 acre land to build on
- If still concerned about space Trabuco 230 kV switchyard could become gas insulated (similar to the planned Capistrano 230 kV switchyard) and use half the available space
  - Raises the cost of Alternative J (later slide)

# Capistrano Versus Trabuco Substation



Trabuco Substation – Alternative J





# Cost of Alternative J Versus SOCREP

Cost Components	SOCREP Cost (SDG&E)	Alt J Cost (per SDG&E)	Alt J Cost (Frontline)	Major Elements Constituting the Cost	
				SOCREP	Alt J
<b>Cost of the 230/138/12 kV Substation(s)</b>	\$222 million (inclusive of permitting and AFUDC)	\$502-\$594 million	\$86 million	<ul style="list-style-type: none"> <li>* <b>Nine (9)</b> 230 kV <b>gas</b> breakers</li> <li>* <b>Two (2)</b> 230/138 kV transformers</li> <li>* <b>Twenty four (24)</b> 138 kV breakers</li> <li>* Talega reconfiguration</li> </ul>	<ul style="list-style-type: none"> <li>* <b>Six (6)</b> 230 kV <b>air</b> breakers</li> <li>* <b>Two (2)</b> 230/138 kV transformers</li> <li>* <b>One (1)</b> 138 kV breaker</li> <li>* <b>Same</b> as Talega reconfiguration</li> </ul>
<b>Cost of 230 kV Transmission Lines</b>	\$130 million (inclusive of permitting and AFUDC)	\$16-\$20 million	\$5 million	<ul style="list-style-type: none"> <li>* <b>7.8 miles</b> of double circuit 230 kV line</li> <li>* <b>1900 feet</b> of underground 230 kV cable</li> </ul>	<ul style="list-style-type: none"> <li>* <b>0.5 miles</b> of double circuit 230 kV line</li> <li>* <b>No</b> undergrounding of 230 kV lines</li> </ul>
<b>Cost of 138 kV Lines</b>	\$25 million	\$0	\$0	Relocation of 1.8 miles of 138 kV transmission lines	None
<b>Cost of Distribution Upgrade</b>	\$7.1 million	\$0	\$0	Relocating several 12-kV distribution lines segments (approximately 6 miles) into underground conduit	None